SAC FORM 96, DEC 85 PREVIOUS EDITION WILL BE USED

5 November 1988

Ms Ayn Schmidt
US EPA Region IX
RCRA Programs Section (T-2-1)
Toxics and Waste Management Division
215 Fremont Street
San Francisco CA 94105-2306

Dear Ms Schmidt

The attached package is presented to amend the Part A application submitted by Vandenberg AFB on 7 November 1980. The treatment process involved is Explosive Ordnance Disposal (EOD) which involves open burning and open detonation of explosive wastes. Although we cannot be certain — the military and civilian personnel involved have turned over several times since initial submission — it appears that Process Code TO-4 was inadvertently omitted. As a result, no explanation was provided in Item III-C. Possibly, these personnel believed that EOD activities were covered by Process Code TO-3 for Waste Code DOO1.

Although we can't be certain of the above scenario, we do wish to clear up any ambiguity expiditiously. EOD activities are a critical part of the overall mission at Vandenberg; discontinuance, however slight, could be catastrophic to human health, property and the environment. This waste is extremely dangerous to transport. Moving it off the installation would create a health hazard for communities along transportation routes. Some of it cannot be transported due either to its nature (since portions of the installation were used by the Army as an artillery range we frequently find undetonated ordnance that is extremely sensitive to movement) or because it is classified. It is far safer to explode or burn this material in a controlled environment under the supervision of experts.

The area involved is isolated and barren. It is fenced, with appropriate warning signs. There are no nearby wetlands, and preliminary investigations indicate no ground water in the area. No environmental damage has occurred; however, we are currently conducting an analysis under the Installation Restoration Program to determine and mitigate any subsequently discovered adverse effects.

The package has been formatted in accordance with 40 CFR 270.13, titled "Contents of Part A of the permit application."

a) The activities conducted are open burning/open detonation of explosive wastes.

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- (3) Disposal: Any ordnance items remaining after treatment are placed in a burial pit IAW Air Force Regulations. These items (eg empty casings) cannot be transported for the same reasons discussed above
 - (4) The design capacity of the EOD disposal range is as follows:
 - (1) 500 pounds net explosive weight (uncased)
 - (2) 250 pounds net explosive weight (cased)
 - j) (1) Specification of hazardous waste: See Atch 4
- (2) Annual estimates of quantities: 5000 pounds net explosive weight.
- (3) Description of processes: See Atch 5, Technical Manual, "General Instruction for Disposal of Conventional Munitions."
 - k) Existing Part B permit is described in g above.
- 1) See Atch 6, topographical map, includes sheets 36, 37, 33, and 38 of Vandenberg's master plan. Also includes a geological survey map.
- m) United States Air Force explosive ordnance disposal detects, identifies, renders safe, recovers, or destroys United States and foreign explosive, incendiary and nuclear ordnance IAW United States Air Force Regulations. Nuclear ordnance is not disposed of on Vandenberg.

We are implementing contract procedures to acquire the information require for the Part B. Point of contact is Lt Crummel at 805-866-5724.

Sincerely

ORVILLE G. ROBERTSON, Colonel, USAF Director, Environmental Management

- 6 Atch
- 1. Notification of HW Activity EPA Form 8700-12
- 2. Scale drawing of Vandenberg
- 3. Photos of EOD area
- 4. Specification of HW
- 5. Description of Processes
- 6. Topographical Map

cc: 394 ICBMMS/MBAWE

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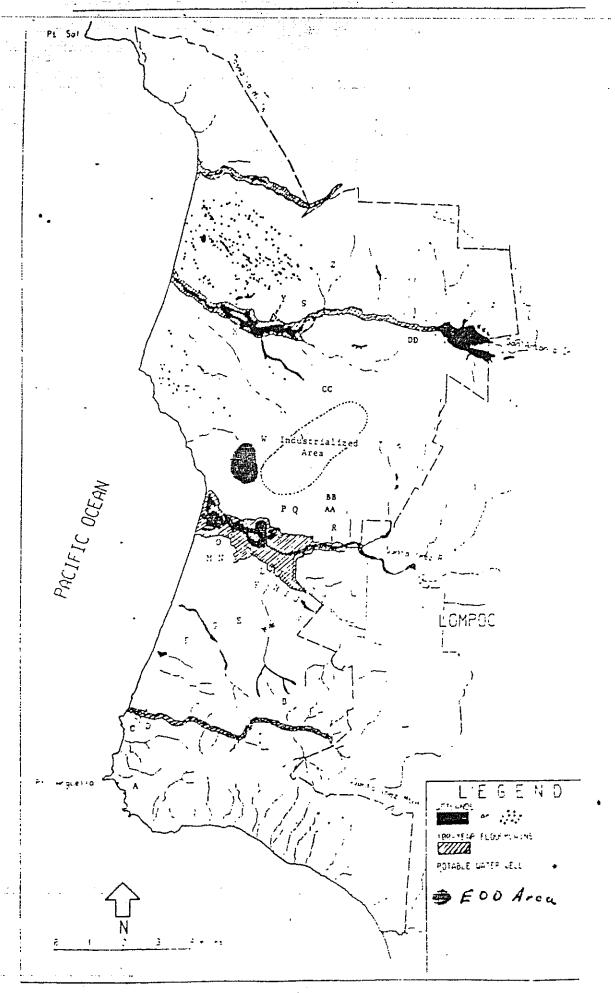
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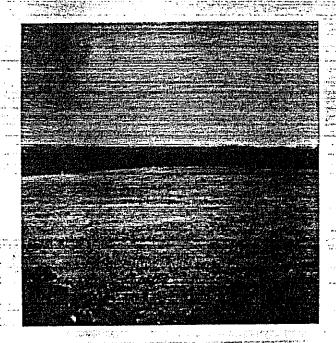
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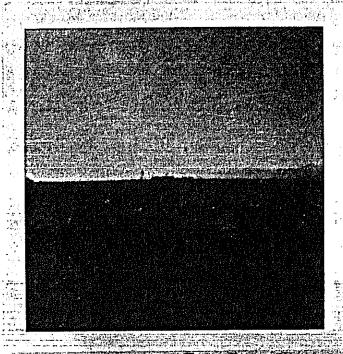
ATTACHMENT #2



Disposal Blow Hole



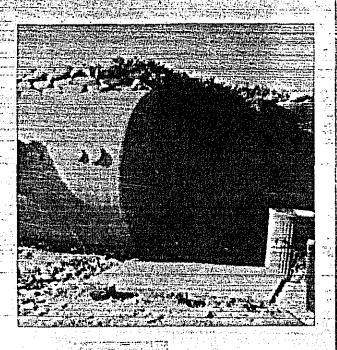
Looking North From Blow Hole



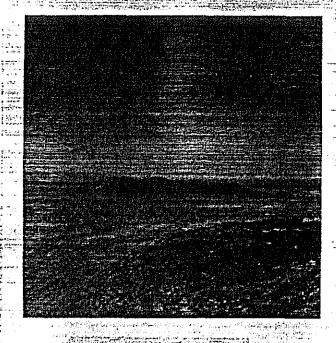
Looking South-East From Blow Hole



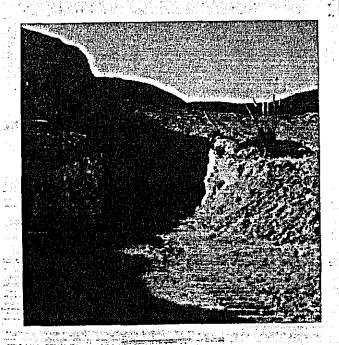
Looking West From Blow Hole



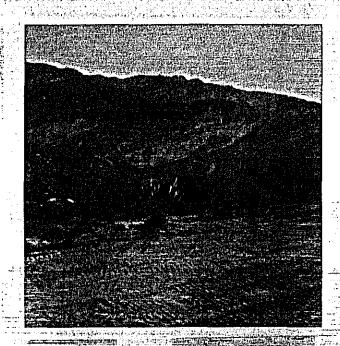
Shelter



West From Shelter



Burial Pit



Burial Pit

Different Angle

SPECIFICATION OF HAZARDOUS WASTE

NOMENCLATURE	QTY	EPA WASTE CODE NUMBERS	WEIGHT (ea)
MK 25 SEA MARKER	11 EA	D003	3 LBS
SLAP FLARE	1 EA	D001	1 LB
RETRO ROCKET MOTORS W/	13 EA	D001	5 LBS
IGNITER			
.45 AND .38 AMMO	50 EA	D001	LESS THAN 1 LB
66 mm MORTAR	1 EA	DOO 1	3 LBS
ROAD FLARES	3 EA	D001	1 L.B
76 mm APT	1 EA	D001	10 LBS
MK 58 SEA MARKER	1 EA	D003	5 LBS
MK 6 SEA FLARE	18 EA	D003	5 LBS
105 mm HE PROJECTILE	1 EA	D001	10 LBS
57 MM APT	3 EA	D0001	2 LBS
TITAN SOLID PROPELLANT	49 EA	D001	49 LBS
2.36 ROCKET MOTORS	7 EA	D001	2 LBS
2.75 ROCKETS H.E.	14 EA	DOO 1	3 LBS
75 mm H.E. PROJO	2 EA	D001	1 LB
40 mm	2 EA	D001	1 LB
M14 SMOKE GRENADES	9 EA	D001	1 LB
MK2 GRENADES H.E.	2 EA	D001	1 L.B
MISC PROJO FUSES	3 EA	D001	LESS THAN 1 LB
81 mm WP	1 EA	D003	3 LBS
60 mm WP	2 EA	D003	1.5 LB
105 mm WP	1 EA	D003	7 LBS
75 mm WP	1 EA	D003	2 LBS

ATTACHMENT # 4

TECHNICAL MANUAL

GENERAL INSTRUCTIONS FOR DISPOSAL OF CONVENTIONAL MUNITIONS

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ATTACHMENT #5

1 MARCH 1979 CHANGE 16 - 6 JUNE 1988